

## **EXHIBIT E**

5 ROBERT HUFF,

6 Plaintiff,

7

8 v Case No. 17-13556

9 HON. SEAN F. COX

10 VELO ASSOCIATES, PLC, et al.,

MAGISTRATE JUDGE

11 ELIZABETH A. STAFFORD

12 Defendants.

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14 /

16 The Deposition of PATRICK SOMMERVILLE, 30(b)(1)

17                    Taken at 43695 Michigan Avenue,

18 Canton, Michigan 49503,

19 Commencing at 10:31 a.m.,

20 Friday, June 29, 2018

21 Before Diane H. Draug

22

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06/29/2018

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1 APPEARANCES:

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10 Appearng on behalf of the Plaintiff.

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19 Appearng on behalf of the Patrick Sommerville.

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1 BY MR. WARNER:

2 Q. And I should have phrased the question better and there  
3 was an objection. I'm excluding things on the website.

4 So, for example, for the URL

5 http://accountadjustment.us/accountadjustmentbureau does  
6 not control the content of what's on that website?

7 A. I don't own the company, I manage it. As the manager  
8 or the consultant, I don't have any direct input into  
9 this. What the owner does to it, I have no idea.

10 Q. Going back to the lawsuit that you had indicated that  
11 Mr. Velo was sued on, do you remember that previous  
12 question?

13 A. Can you give me the plaintiff's name?

14 Q. It's just the other lawsuit that you had just talked  
15 about that you gave the deposition in.

16 A. Okay.

17 Q. Do you remember what the allegations against Mr. Velo  
18 were?

19 A. Not particularly, no.

20 Q. Okay. What is Account Adjustment Bureau's relationship  
21 with the Velo Law Firm?

22 A. Client/attorney.

23 Q. And how did Account Adjustment Bureau hire the Velo Law  
24 Firm?

25 A. I'm not sure. He was part of the operation or part of

1                   the relationship when I took over as general manager

2                   October 31st of 2015.

3   Q.   So who would have been in your position prior to  
4                   October 31st, 2015 at Account Adjustment Bureau?

5   A.   William Mcarary. McCrary?

6   Q.   Do you know where Mr. Mcarary is?

7   A.   I have no idea. I let him go.

8   Q.   How do you spell his last name?

9   A.   M-c-a-r-a-r-y, I believe, Mcarary, something like that.  
10                  M-c-r? Mcarary. I'd have to look it up. I don't  
11                  remember. You have to remember I'm 67 years old. I'm  
12                  forgetting things.

13   Q.   Okay. My father is in his 80's. He's still pretty  
14                  sharp.

15   A.   Oh, well. Pretty sharp?

16   Q.   I don't give any credence to a person's age.

17   A.   Okay. All right. Well, I can't use that excuse  
18                  anymore.

19   Q.   Is there a written contract between Account Adjustment  
20                  Bureau and the Velo Law Firm for the Velo Law Firm's  
21                  services?

22   A.   I haven't seen one, but I'm sure there is. Haven't  
23                  looked. It's just a given. I'm sure there is. Every  
24                  attorney that we've done business with since my  
25                  administration we've had contracts, so there was.

1 Adjustment Bureau does?

2 A. Towards commercial accounts, I would say yes. But this  
3 only references commercial accounts.

4 Q. Account Adjustment Bureau also does consumer accounts;  
5 correct?

6 A. Correct.

7 Q. Like, for example, in regards to Mr. Huff, a debt  
8 regrading a rental of a mobile home in a site lot?

9 A. Was that what it was? I'm not sure if it was both the  
10 site lot and the home.

11 Q. What is your knowledge of the debt of Mr. Huff?

12 A. That it was either a Sun Homes account or a Sun -- it  
13 was either the lot rent, or for the home or for both.

14 At one time Mr. Huff was paying the account, and then I  
15 believe my recollection is that he went to a debt  
16 counselor, possibly. Maybe it's a different account,  
17 but I think it says something like that, and then he  
18 paid through them and then all of a sudden he quit  
19 paying. Sun Homes referred it to Mr. Velo's office or  
20 Mr. Renner's office.

21 Q. Well, how does Sun Homes refer it to Mr. Renner's  
22 office if it's -- you had mentioned that AAB contracts  
23 with the Velo Law Firm.

24 A. They authorize us to hire an attorney for them based on  
25 our professionalism and knowledge of the best attorney

1           in Michigan to hire, and we asked Mr. Velo or Mr.

2           Renner if he would take this case.

3   Q.    So before when you said Mr. Velo, we're talking Mr.

4           Renner?

5   A.    Or, yeah, I confuse those sometimes.

6   Q.    Completely, you know -- most attorneys use their name,

7           like Kelley & Evanchek here and --

8   A.    He uses a different name.

9                         MS. DEMARTE: The only other thing I'd say,  
10          you're starting to talk over Mr. Warner a little bit.

11                         THE WITNESS: Oh, I'm sorry.

12                         MS. DEMARTE: I want to make sure we have a  
13          clear record.

14                         MARKED FOR IDENTIFICATION

15                         DEPOSITION EXHIBIT D

16                         10:53 a.m.

17   BY MR. WARNER:

18   Q.    I'd like to hand you what we've marked as Exhibit D.

19                         MS. DEMARTE: Thank you.

20   BY MR. WARNER:

21   Q.    And have you seen the document that we have marked as  
22          Exhibit D before?

23   A.    I think the only -- first time I looked at it was in  
24          possibly discovery or somewhere. I've never seen it  
25          other than through discovery through what we supplied.